

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs – Judgment Creditors,

v.

C.A. No. 00 – 105 L

THE PALESTINIAN AUTHORITY, et al.,

Defendants – Judgment Debtors.

MOTION TO SEAL

Now comes the Plaintiffs and hereby move to seal the anticipated consent order with respect to the Consent Motion filed on October 19, 2009. Dkt. # 456.

This motion is supported by the attached memorandum. A proposed order is also attached hereto.

Plaintiffs, by their Attorney,

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MEMORANDUM IN SUPPORT OF MOTION TO SEAL

The Plaintiffs file this memorandum in support of their motion to seal the order which the parties have requested the Court to enter to modify the May 5, 2005 injunction.

On May 5, 2005, this Court entered an injunction prohibiting the Defendants-Judgment Debtors from withdrawing or transferring their assets “located within the jurisdiction of the United States or any State thereof.” Dkt. #322.

On October 13, 2009, with the explicit consent and authorization of Defendants’ counsel the Plaintiffs filed a Consent Motion modifying May 5, 2005 order (Dkt. #452).

Both the Plaintiffs-Judgment Creditors and the Defendants-Judgment Debtors have agreed that a need has arisen to enable the transfer of funds into the bank account of counsel for the Judgment Creditors. In order to effectuate the transfer and to insure that banks involved in the transfer comply with the proposed Consent Order, the Consent Order lists specific confidential account information.

On October 15, 2009, this Court entered a consent order as requested by the parties. Dkt.# 254.

On October 19, 2009, the parties learned that the account described in said order must be replaced with a new account to effectuate the funds transfer.

Accordingly, the Plaintiffs-Judgment Creditors respectfully request that a new order containing the new account number be entered by the Court forthwith.

Pursuant to this Court's local rules, confidential bank account information must not be revealed in pleadings. However, in order to effectuate the transfer of funds into the Plaintiffs-Judgment Creditors' counsel's account, it is vital that the order specifically contain the account number.

Naturally, the Ungar orphans, their family, Plaintiffs-Judgment Creditors and the Defendants do not want this account information to be made public. Therefore, Plaintiffs respectfully request that the order with respect to the Consent Motion be sealed.

Plaintiffs, by their Attorney,

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CERTIFICATION

I hereby certify that on October 19, 2009 I served this document via email on the following counsel of record:

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